

IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION

FILED

AUG 29 2019

U. S. DISTRICT COURT
EASTERN DISTRICT OF MO
ST. LOUIS

UNITED STATES OF AMERICA,

Plaintiff,

vs.

MARCUS JERMAINE MOORE,
aka "Shorty"; "Short";
"Marcus Stidman";

Defendant.

4:19CR718 RWS/JMB

MOTION FOR PRE-TRIAL DETENTION AND HEARING

Comes now the United States of America, by and through its attorneys, Jeffrey B. Jensen, United States Attorney for the Eastern District of Missouri, and Angie E. Danis, Assistant United States Attorney for said District, and moves the Court to order defendant detained pending trial, and further requests that a detention hearing be held three (3) days from the date of defendant's initial appearance before the United States Magistrate pursuant to Title 18, United States Code, Section 3141, et seq.

As and for its grounds for detention, the government requests this Court to consider the following factors pursuant to Title 18, United States Code, Section 3142(g)(1), (2), and (3):

Presumption of Detention

1. The defendant is charged in Count 1 with offenses for which a maximum term of imprisonment of 20 years is prescribed in the Controlled Substances Act Title 21, United States Code, Section 801, et seq.), conspiracy to distribute controlled substances.

2. Accordingly, a rebuttable presumption arises, pursuant to Title 18, United States Code, Section 3142(e)(3), that there are no conditions or combination of conditions which will reasonably assure the safety of any other person and the community.

The Nature and Circumstances of the Offense

3. The defendant is charged in Count I of the Indictment with Conspiracy to Distribute both heroin and fentanyl.

4. The current case involves Marcus Moore acting as a distributor of heroin and fentanyl to multiple, lower-level dealers, who would then redistribute the controlled substances throughout the St. Louis Metropolitan area.

5. Marcus and his cousin, co-defendant Christopher Moore, ran a car wash located at 3840 Cote Brillante, in the City of St. Louis, which served as a base of their criminal enterprise. From this location, Marcus Moore is captured on wiretap surveillance and physical surveillance dealing controlled substances.

The Weight of the Evidence Against the Defendant

6. The defendant is a documented member of the 41 Delmar Mob criminal street gang, which, in addition to narcotics dealing, has been involved in multiple acts of violence, to include murder, throughout the St. Louis area since as early as the 1990s.

7. The defendant is captured on both audio and video surveillance engaging in his criminal activities, to include controlled purchases of narcotics made directly from him.

**The History and Characteristics of the Defendant and
the Nature and Seriousness of the Danger to the Community**

8. The defendant was on federal supervised release at the time of much of the conduct encompassed in this Indictment. Since on federal supervised release for narcotic and weapons

offenses, the defendant has twice been revoked, displaying a pattern of not conforming with conditions of supervision.

9. The defendant has multiple other convictions involving the distribution of narcotics.

WHEREFORE, the government requests this Court to order defendant detained prior to trial, and further to order a detention hearing three (3) days from the date of defendant's initial appearance.

Respectfully submitted,

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UNITED STATES ATTORNEY

/s/ Angie E. Danis

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